

EXHIBIT A

**Service of Process
Transmittal**

05/30/2018

CT Log Number 533430076

TO: Renee Simonton, President
RELX Inc.
1105 North Market Street, Fifth Floor
Wilmington, DE 19801

RE: Process Served in Kansas

FOR: LexisNexis Risk Solutions Inc. (Domestic State: GA)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: John R. Ebling and John J. Ebling, Jr., Pltfs./Petitioners vs. LexisNexis Risk Solutions, Inc. and Central Credit Services, LLC, Dfts./Respondents

DOCUMENT(S) SERVED: Summons, Summons/Garnishment Service Packet, Affidavit, Petition

COURT/AGENCY: Jackson County Circuit Court, MO
Case # 1816CV12965

NATURE OF ACTION: Violations of the Fair Credit Reporting Act

ON WHOM PROCESS WAS SERVED: The Corporation Company, Inc., Topeka, KS

DATE AND HOUR OF SERVICE: By Certified Mail on 05/30/2018 postmarked on 05/24/2018

JURISDICTION SERVED : Kansas

APPEARANCE OR ANSWER DUE: June 27, 2018 at 9:00 a.m.

ATTORNEY(S) / SENDER(S): ALAN J. STECKLEIN
748 ANN AVENUE
KANSAS CITY, KS 66101
913-371-0727

ACTION ITEMS: CT has retained the current log, Retain Date: 05/31/2018, Expected Purge Date: 06/05/2018

Image SOP

Email Notification, Renee Simonton renee.simonton@relx.com

Email Notification, Julie Goldweitz julie@reilaw.com

Email Notification, Jacqueline Gregorski jacqueline.gregorski@relx.com

SIGNED: The Corporation Company, Inc.

ADDRESS: 112 S.W. 7th Street
Suite 3C
Topeka, KS 66603

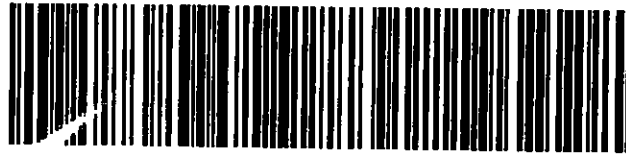
TELEPHONE: 954-473-5503

Page 1 of 1 / WT

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

CERTIFIED MAIL

JACKSON COUNTY CIRCUIT COURT
ASSOCIATE CASE INITIATION SRD
415 E 12TH ST
KANSAS CITY, MO 64106-2703



9214 8901 0661 5400 0123 7153 44

RETURN BY CERT (ELECTRONIC)



U.S. POSTAGE & METS
ZIP 64106 \$003.37
02 47
0000343259 MAY 24 2018

1818 CV 00496
1120 N 10TH RISK SOLUTIONS INC
N 10TH CORPORAION COMPANY INC
1120 W 7TH ST STE 3C
TOPEKA, KS 66603-3858

RETURN SERVICE
REQUESTED

JACKSON COUNTY CIRCUIT COURT
ASSOCIATE CASE INITIATION 3RD
415 E 12TH ST
KANSAS CITY, MO 64106-2706



9214 8901 0661 5400 0123 7153 44

RETURN RECEIPT (ELECTRONIC)

1816-CV12965

LEXISNEXIS RISK SOLUTIONS INC
RA: THE CORPORATION COMPANY INC
112 SW 7TH ST STE 3C
TOPEKA, KS 66603-3858

RETURN SERVICE
REQUESTED

CUT / FOLD HERE

8"x9" ENVELOPE
CUT / FOLD HERE

CUT / FOLD HERE



IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: CORY LEE ATKINS	Case Number: 1816-CV12965
Plaintiff/Petitioner: JOHN R EBLING	Plaintiff's/Petitioner's Attorney/Address, or Plaintiff/Petitioner, if pro se: ALAN J. STECKLEIN 748 ANN AVENUE KANSAS CITY, KS 66101 (913) 371-0727
Defendant/Respondent: LEXISNEXIS RISK SOLUTIONS, INC.	Date, Time, and Location of Court Appearance: 27-JUN-2018, 09:00 AM DIVISION 26 7TH FLOOR 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: AC Other Tort	

(Date File Stamp)

Associate Summons for Service by Registered or Certified Mail

The State of Missouri to: **LEXISNEXIS RISK SOLUTIONS, INC.**
Alias:

RA: **THE CORPORATION COMPANY, INC.**
112 SW 7TH STREET SUITE 3C
TOPEKA, KS 66603



You are summoned to appear before this Court on the date, time, and location above, to answer the allegation in the petition filed by the above-named Plaintiff/Petitioner, a copy which of which is attached. If you fail to appear at the time and place stated in this summons, judgment by default will be taken against you for the relief demanded in the petition.

If you have a disability requiring special assistance for your court appearance, please contact the court at least 48 hours in advance of scheduled hearing.

24-MAY-2018
Date Issued


Clerk

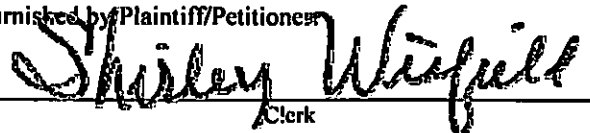
Further Information:

Certificate of Mailing

I certify that on 24-MAY-2018 (date), I mailed a copy of this summons and a copy of the petition to Defendant/Respondent **LEXISNEXIS RISK SOLUTIONS, INC.** by registered or certified mail, requesting a return receipt by the addressee only, to the said Defendant/Respondent at the address furnished by Plaintiff/Petitioner.

24-MAY-2018

Date


Clerk

SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION

Under the Missouri e-filing system now utilized by the 16th Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

16thcircuit.org → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County

**In the Associate Circuit Court of Jackson County, Missouri
At Kansas City**

John R. Ebling and John J. Ebling, Jr.,

Plaintiffs

vs.

LexisNexis Risk Solutions, Inc. and Central
Credit Services, LLC

Defendants.

Case Number: 1816-CV12965

AFFIDAVIT IN SUPPORT OF SERVICE BY CERTIFIED MAIL

STATE OF KANSAS)

) ss.

COUNTY OF WYANDOTTE)

A.J. Stecklein, of lawful age, being first duly sworn upon his oath, deposes and states that:

1. He is the attorney for the above-named Plaintiff, being licensed to practice in the State of Missouri, having his office at 748 Ann Avenue, Kansas City, Kansas 66101.

2. The Defendant LexisNexis Risk Solutions, Inc. is a foreign corporation with corporate headquarters in Georgia.

3. The name and address of the Defendant's registered agent is THE CORPORATION COMPANY, INC., 112 SW 7TH STREET SUITE 3C, TOPEKA, KS 66603.

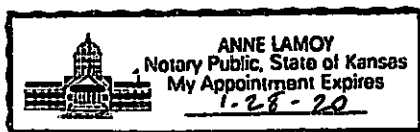
4. Personal service may not be obtained on the Defendant LexisNexis Risk Solutions, Inc. in Jackson County, Missouri.


5. The name and address of the party to be served by certified mail is THE CORPORATION COMPANY, INC., 112 SW 7TH STREET SUITE 3C, TOPEKA, KS 66603.

Respectfully Submitted,

By: 
A.J. Stecklein #46663
Michael H. Rapp #66688
Matthew Robertson #70442
Stecklein & Rapp, Chtd.
748 Ann Ave
Kansas City, KS 66101
Telephone: (913) 371-0727
Facsimile: (913) 371-0727
Email: aj@kcconsumerlawyer.com
mr@kcconsumerlawyer.com
msr@kcconsumerlawyer.com
Attorneys for Plaintiff

Subscribed and sworn to before me, a notary public, on May 22, 2018.




Notary Public

**In the Associate Circuit Court of Jackson County, Missouri
At Kansas City**

JOHN R. EBLING AND JOHN J. EBLING,
JR.,

Plaintiffs,

vs.

LEXISNEXIS RISK SOLUTIONS, INC. AND
CENTRAL CREDIT SERVICES, LLC,

Defendants.

Case Number: _____

PETITION

COME NOW Plaintiffs, by and through counsel, and for Plaintiffs' causes of action against Defendants state as follows:

1. This is an action for damages brought by an individual consumer against the Defendant LexisNexis Risk Solutions, Inc. for violations of the Fair Credit Reporting Act (hereafter FCRA) 15 U.S.C. §1681 et seq.
2. This is also an action for damages brought by an individual consumer against the Defendant Central Credit Services, LLC for violations of the Fair Debt Collection Practices Act (hereafter FDCPA) 15 U.S.C. §1692 et seq.
3. Jurisdiction of this Court arises under 15 U.S.C. §1681p and 28 U.S.C. §1331.

4. The Court further has concurrent jurisdiction over the Fair Debt Collection Practices Act pursuant to 15 USC §1692k(d).

5. Venue lies properly in this district pursuant to 28 U.S.C. §1391(b).

6. Plaintiffs are residents of Missouri.

7. Defendant LexisNexis Risk Solutions, Inc. is a Georgia Corporation.

8. At all times relevant hereto, Defendant LexisNexis Risk Solutions, Inc. was and is engaged in the business of compiling consumer reports in Missouri.

9. Defendant Central Credit Services, LLC is a Florida Limited Liability Company.

10. At all times relevant hereto, Defendant Central Credit Services, LLC was and is engaged in the business of collecting consumer debts in Missouri.

COUNT I
VIOLATIONS OF THE FAIR CREDIT REPORTING ACT
Defendant LexisNexis Risk Solutions, Inc.

Comes now Plaintiffs and for Count I against the Defendant LexisNexis Risk Solutions, Inc. states and alleges to the Court as follows:

11. Plaintiffs incorporate the foregoing paragraphs as though the same were set forth at length herein.

12. At all times pertinent hereto, the Plaintiff John R. Ebling is a “consumer” as that term is defined by 15 U.S.C. §1681a(c).

13. At all times pertinent hereto, the Plaintiff John J. Ebling, Jr. is a “consumer” as that term is defined by 15 U.S.C. §1681a(c).

14. As of April 2018, Defendant LexisNexis Risk Solutions, Inc. generated and sold Accurint Reports to third party debt collectors.

15. As of April 2018, Accurint Reports were used by debt collectors to locate debtors for collecting debts.

16. As of April 2018, Defendant LexisNexis Risk Solutions, Inc. was combining or mixing the personal identifying information of Plaintiffs, father and son, onto each other's Accurint reports.

17. The mix merging of the personal identifiers onto each other's Accurint Reports causes confusion between Plaintiffs.

18. At all times pertinent hereto, the above-mentioned consumer reports were written, oral, or other communication of any information by a consumer reporting agency bearing on a consumer's credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living which is used or expected to be used or collected in whole or in part for the purpose of serving as a factor in establishing the consumer's eligibility for credit or insurance to be used primarily for personal, family, or household purposes; employment purposes; or any other purpose authorized under 15 U.S.C. 1681b.

19. Pursuant to 15 U.S.C. §1681n and 15 U.S.C. §1681o, Defendant LexisNexis Risk Solutions, Inc. is liable to the Plaintiffs for willfully and negligently failing to comply with the requirements imposed on consumer reporting agencies of information pursuant to 15 U.S.C. §1681e(b) in assuring reasonable procedures to assure maximum possible accuracy to prevent such reporting of inaccurate information in

Plaintiff's reports.

20. Defendant LexisNexis Risk Solutions, Inc. has been reporting and reinserting derogatory and inaccurate statements and information relating to Plaintiff and Plaintiff's credit history to third parties (hereafter the "inaccurate information").

21. Upon information and belief, Plaintiffs' creditors and potential creditors have accessed Plaintiffs' reports while the misreporting was on the credit report and were misinformed by Defendant LexisNexis Risk Solutions, Inc. about Plaintiffs' credit worthiness.

22. The inaccurate information negatively reflects upon the Plaintiffs, Plaintiffs' credit repayment history, and Plaintiffs' financial responsibility as a debtor and credit worthiness.

23. The inaccurate information leads to confusion between the Plaintiffs, unlawful debt collection, and inaccurate credit reporting.

24. The conduct of Defendant LexisNexis Risk Solutions, Inc. was a direct and proximate cause, as well as a substantial factor, in bringing about the serious injuries, actual damages and harm to the Plaintiff that are outlined more fully above and, as a result, Defendants are liable to the Plaintiffs for the full amount of statutory, actual and punitive damages, along with the attorneys' fees and the costs of litigation, as well as such further relief, as may be permitted by law.

WHEREFORE, Plaintiffs seeks judgment in Plaintiffs' favor and damages against the Defendant LexisNexis Risk Solutions, Inc. based on the following requested relief:

a. Actual damages;

- b. Statutory damages;
- c. Punitive damages;
- d. Costs and reasonable attorney's fees pursuant to 15 U.S.C. §§1681n and 1681o; and
- e. Such other and further relief as may be necessary, just and proper.

COUNT II
VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT
Defendant Central Credit Services, LLC

Comes now Plaintiffs and for Count II against Defendant Central Credit Services, LLC and states and alleges to the Court:

25. Plaintiffs incorporate the foregoing paragraphs as though the same were set forth at length herein.

26. Defendant Central Credit Services, LLC is a Georgia Corporation.

27. At all times relevant hereto, Defendant Central Credit Services, LLC was and is engaged in the business of collecting consumer debts in Missouri.

28. The Court has concurrent jurisdiction over the Fair Debt Collection Practices Act pursuant to 15 USC §1692k(d).

29. This is an action for damages brought by an individual consumer for Defendant's violations of the Fair Debt Collection Practices Act, 15 U.S.C. §1692, *et seq.* (hereinafter FDCPA), which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.

30. Plaintiff John R. Ebling is a consumer as defined by 15 USC §1692a(3) of the FDCPA.

31. Plaintiff John J. Ebling, Jr. is a consumer as defined by 15 USC §1692a(3) of the FDCPA.

32. The principal purpose of Defendant Central Credit Services, LLC is the collection of consumer debts using the mails and telephone, and Defendant regularly attempts to collect debts alleged to be due another.

33. Defendant Central Credit Services, LLC is a debt collector as defined by 15 USC §1692a(3) who uses any instrumentality of interstate commerce or the mails in any business, the principal purpose of which is the collection of any debts, or who regularly collects or attempts to collect, directly or indirectly, debts owed or due or asserted to be owed or due another or by taking of assignment of a debt already declared to be in default by the originating creditor.

34. In February 2018, Defendant Central Credit Services, LLC reported a debt alleged to be owed to Laboratory Corporation of America for a balance of \$51.00 as past due on Plaintiff John R. Ebling's Experian credit report.

35. On February 12, 2018, Plaintiff's Experian credit report was accessed by Fairway Independent Mortgage Corporation.

36. The Laboratory Corporation of America for a balance of \$51.00 as past due on Plaintiff John R. Ebling's Experian credit report belonged to Plaintiff's father, John J. Ebling, Jr.

37. Plaintiff John J. Ebling, Jr. did not want his son to know about the past due account.

38. Plaintiff John R. Ebling, did not want father's collection account on his Experian credit report.

39. 15 U.S.C. § 1692e entitled false or misleading representations states that a debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt.

40. Specifically, 15 U.S.C. § 1692e(8) prohibits communicating or threatening to communicate to any person credit information which is known, or which should be known to be false, including the failure to communicate that a disputed debt is disputed.

41. Defendant Central Credit Services, LLC violated 15 U.S.C. § 1692e(8) as to Plaintiff John J. Ebling, Jr. by informing Experian, and his son John R. Ebling that he owed a debt by reporting the debt information on John R. Ebling's credit report.

42. 15 U.S.C. § 1692f, entitled unfair practices. states that a debt collector may not use unfair or unconscionable means to collect or attempt to collect any debt.

43. Specifically, 15 U.S.C. § 1692f(1) prohibits the collection of any amount unless such amount is expressly authorized by the agreement creating the debt or permitted by law.

44. Defendant Central Credit Services, LLC violated 15 U.S.C. § 1692e(8) as to Plaintiff John R. Ebling by reporting a debt that Plaintiff John R. Ebling on John R.

Ebling's Experian report. The above-described acts are misleading to the unsophisticated consumer.

45. Furthermore, 15 U.S.C. § 1692e(10) prohibits the use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.

46. Defendant Central Credit Services, LLC violated 15 U.S.C. § 1692e(10) as to both Plaintiffs.

47. Defendant Central Credit Services, LLC's acts, as described above, were done intentionally with the purpose of coercing Plaintiff to pay the alleged debt.

48. As a result of the above violations of the stated Act, the Defendant Central Credit Services, LLC is liable to the Plaintiff for actual damages; statutory damages up to \$1,000.00 pursuant to 15 U.S.C. §1692k; costs and reasonable attorney's fees pursuant to 15 U.S.C. §1692k.

WHEREFORE, Plaintiffs respectfully pray that judgment be entered against the Defendant Central Credit Services, LLC for actual damages; statutory damages pursuant to 15 U.S.C. §1692k; costs and reasonable attorney's fees pursuant to 15 U.S.C. §1692k; and for such other and further relief as may be just and proper.

Respectfully submitted,
By: /s/ A.J. Stecklein
A.J. Stecklein #46663
Michael Rapp #66688
Matthew Robertson #70442
Stecklein & Rapp
748 Ann Avenue
Kansas City, KS 66101
Telephone: (913) 371-0727
Facsimile: (913) 371-0727
Email: aj@kcconsumerlawyer.com
mr@kcconsumerlawyer.com
msr@kcconsumerlawyer.com
Attorneys for Plaintiffs